

# EXHIBIT K

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA EMAIL**

September 29, 2016

Steven T. Cottreau, Esq.  
Clifford Chance US LLP  
2001 K Street, N.W.  
Washington, DC 20006

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)*

Dear Steve:

Thank you for your recent inquiry regarding the status of plaintiffs' list of 500 individuals and/or entities to be searched in DIB's legacy account database per Judge Maas' March 22, 2016 order. Plaintiffs share your desire to move forward with this search for responsive documents, but I note that the process of finalizing our list has been delayed in large part due to DIB's slow response to comply with the Court's order directing it to promptly search for and produce several important categories of documents, including documentation relating to investigations and/or other inquiries concerning DIB's connections to the 1998 U.S. Embassy bombings. You will recall that by letter dated May 6, 2016, plaintiffs explained that it would be inefficient for us to exchange our list of 500 individuals and/or entities until after DIB had completed its searches for all responsive materials relating to the embassy bombings and associated issues, and produced those records to the plaintiffs. We did not hear from your office again on this issue until August 11, 2016 when DIB made a supplemental production of documents (DIB004196-5023), a time when many of the lawyers and consultants on our side were away on summer vacation with their families. Plaintiffs are diligently analyzing the materials received from your client and are preparing our list which we intend to send to you later next week. We will also be sending a letter concerning the August 11<sup>th</sup> supplemental document production.

Sincerely,



J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

JST

Steven T. Cottreau, Esq.

September 29, 2016

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cc: Members of Plaintiffs' Executive Committees (via E-Mail)